



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2488

DATE SCANNED 5/4/12

SCANNER NO. 2

SCAN OPERATOR SES

12092680504



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 21, 2011

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer
Acting Staff Director

FROM: Patricia Carmona *PC*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: Jodi Winship *JW*
Compliance Branch

SUBJECT: Reason to Believe Recommendation -
Failure to File 48-Hour Notices under the Administrative Fine Program

Attached is the name of a principal campaign committee that has failed to file 48-hour notices with the Commission for contributions of \$1,000.00 or more received from the close of books for the Rhode Island 12 Day Pre-General Report up to 48 hours before the November 2, 2010 General Election in accordance with 2 U.S.C. § 434(a)(6) and 11 CFR. § 104.5(f). The committee, Cicilline Committee, represents a candidate who won the General Election in Rhode Island. The committee is being referred for failing to file 48-hour notices for contributions totaling \$37,600.00.

A 48-hour notice is required to report all contributions of a \$1,000.00 or more, to any authorized committee of a candidate, including contributions from the candidate, loans from the candidate and other non-bank sources and endorsements or guarantees of loans from banks, as per, 11 CFR § 104.5(f).

We have attached an information sheet which includes the contributor name, date of receipt and amount of the contributions for which a 48-hour notice was not filed.

In accordance with the schedule of civil money penalties outlined within 11 CFR § 111.44, this committee should be assessed the civil money penalty so indicated.

Attachment 1

12092680505

Recommendation

1. Find reason to believe that Cicilline Committee and Nancy L. Benoit, Treasurer, violated 2 U.S.C. § 434(a) and make a preliminary determination that a civil money penalty of \$4,530.00 be assessed.
2. Send the appropriate letter.

Attachment

12092680506

Contributions for Which a 48-Hour Notice Was Not Received

AF 2488

Committee ID: C00476564

Committee Name: Cicilline Committee

Report Type: 30 Day Post General Report (10/14/2010 – 11/22/2010)

48-Hour Reporting Period: 10/14/2010 – 10/30/2010

CONTRIBUTOR NAME	DATE	AMOUNT
LEE, BROOKE	10/18/2010	\$1,900.00
LEE, EUGENE	10/18/2010	\$1,900.00
NELSON, CARL	10/18/2010	\$2,400.00
NELSON, CHRISTINE	10/18/2010	\$2,400.00
MURRAY, SUZANNE Y.	10/19/2010	\$2,400.00
VAREIKA, ALISON	10/20/2010	\$2,400.00
VAREIKA, WILLIAM M.	10/20/2010	\$2,400.00
TOWNSEND, ALISON K	10/21/2010	\$2,400.00
TOWNSEND, CHARLES C III	10/21/2010	\$2,400.00
MCKINNEY, JOSHUA	10/22/2010	\$2,400.00
CASE, LUCIA GILL	10/23/2010	\$2,400.00
MAGAZINER, IRA	10/23/2010	\$2,400.00
MAGAZINER, SUZANNE	10/23/2010	\$2,400.00
FISH, LAWRENCE K.	10/24/2010	\$2,400.00
GREAT LAND PAC	10/24/2010	\$5,000.00
	TOTAL	\$45,300.00

Proposed Civil Money Penalty: \$4,530.00 ((7 Notices Not Filed at \$110 each) + (10% of the Overall Contributions Not Filed))

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation -) AF 2488
Failure to File 48-Hour Notices under the)
Administrative Fine Program: Cicilline)
Committee and Nancy L. Benoit,)
Treasurer)

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 23, 2011, the Commission decided by a vote of 6-0 to take the following actions in AF 2488:

1. Find reason to believe that Cicilline Committee and Nancy L. Benoit, Treasurer, violated 2 U.S.C. § 434(a) and make a preliminary determination that a civil money penalty of \$4,530.00 be assessed.
2. Send the appropriate letter.

Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

June 24, 2011
Date

Shawn Woodhead Werth
Shawn Woodhead Werth
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 24, 2011

Nancy L. Benoit, in official capacity as Treasurer
Cicilline Committee
118 N. Main St., Suite 2
Providence, RI 02903

C00476564
AF#: 2488

Dear Ms. Benoit:

The Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, *et seq.* ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate or the Federal Election Commission ("FEC"), and the Secretary of State, as appropriate, of any contribution of \$1,000 or more, received by any authorized committee of the candidate after the 20th day, but more than 48 hours before, any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. *Id.* These notification requirements are in addition to all other reporting requirements. 2 U.S.C. § 434(a). Our records indicate that Cicilline Committee did not submit 48-Hour Notices for contributions of \$1,000 or more, received between October 14, 2010 and October 30, 2010, totaling \$37,600, as required by 2 U.S.C. § 434(a)(6)(A). Attachment 1.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. § 434(a). 2 U.S.C. § 437g(a)(4). On June 23, 2011, the FEC found that there is Reason to Believe ("RTB") that Cicilline Committee and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) by failing to file the 48-Hour Notices. Based on the FEC's schedule of civil money penalties at 11 C.F.R. § 111.44, the amount of your civil money penalty calculated at the RTB stage is \$4,530. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.46. Attachment 2. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. <http://www.fec.gov/af/af.shtml>. 11 C.F.R. § 111.34. The amount of the civil money penalty is \$110 for each non-filed notice plus 10 percent of the dollar amount of the contributions not timely reported. The civil money penalty increases by 25 percent for each prior violation. Send your payment of \$4,530 within forty (40) days of the finding, or by August 2, 2011.

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or August 2, 2011. 11 C.F.R. § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 C.F.R. § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 C.F.R. § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 C.F.R. § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 C.F.R. § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not or submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that CiciLine Committee and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 C.F.R. § 111.45.

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 C.F.R. § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ian Wandner in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Cynthia L. Bauerly
Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.44, the amount of your civil money penalty calculated at RTB is \$4,530 for the 2010 General Election 48-Hour Notification Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The remittance and your payment are due by August 2, 2011. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Cicilline Committee

FEC ID#: C00476564

AF#: 2488

PAYMENT DUE DATE: August 2, 2011

PAYMENT AMOUNT DUE: \$4,530

12092680512

Contributions for Which a 48-Hour Notice Was Not Received

AF 2488

Committee ID: C00476564

Committee Name: Cicilline Committee

Report Type: 30 Day Post General Report (10/14/2010 – 11/22/2010)

48-Hour Reporting Period: 10/14/2010 – 10/30/2010

CONTRIBUTOR NAME	DATE	AMOUNT
LEE, BROOKE	10/18/2010	\$1,900.00
LEE, EUGENE	10/18/2010	\$1,900.00
NELSON, CARL	10/18/2010	\$2,400.00
NELSON, CHRISTINE	10/18/2010	\$2,400.00
MURRAY, SUZANNE Y.	10/19/2010	\$2,400.00
VAREIKA, ALISON	10/20/2010	\$2,400.00
VAREIKA, WILLIAM M.	10/20/2010	\$2,400.00
TOWNSEND, ALISON K	10/21/2010	\$2,400.00
TOWNSEND, CHARLES C III	10/21/2010	\$2,400.00
MCKINNEY, JOSHUA	10/22/2010	\$2,400.00
CASE, LUCIA GILL	10/23/2010	\$2,400.00
MAGAZINER, IRA	10/23/2010	\$2,400.00
MAGAZINER, SUZANNE	10/23/2010	\$2,400.00
FISH, LAWRENCE K.	10/24/2010	\$2,400.00
GREATLAND PAC	10/24/2010	\$5,000.00
		Total: \$27,500.00

Proposed Civil Money Penalty: \$4,530.00 ((7 Notices Not Filed at \$110 each) + (10% of the Overall Contributions Not Filed))

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David Cicilline

FOR U.S. CONGRESS

AF#2488

Federal Election Commission
Office of Administrative Review
999 E Street, NW
Washington, DC 20463

Re: Notice of Administrative Fine, dated June 24, 2011

The Cicilline Committee (the "Committee") wishes to challenge Administrative Fine #2488 on the grounds of 1) a miscalculation of the calculated civil money penalty by the FEC; and 2) inconsistencies in the reporting regulations and therefore, a factual error in the RTB finding. Please note we are also filing an Advisory Opinion with the Commission regarding this matter.

(1) MISCALCULATION OF FINE:

On 8/2/11, the Committee amended its 30-Day Post General Report (10/14/10 - 11/22/10) to correct the date of an itemized memo entry from Great Land PAC (C00457747) to accord with 11 CFR 102.17(c)(3)(iii) and (c)(8)(i)(B). This memo was attached to a transfer from Moving Mayors Forward (C00488833), which is a joint fundraiser the Committee is participates in. Moving Mayors Forward originally received the contribution on 9/24/10, effectively rendering it outside the 48-hour notice period. This can be cross referenced with page 6 of Moving Mayors Forward original 2010 October Quarterly Report (Image #1093149480) and is also attached to this document.

(2) INCONSISTENCIES IN REPORTING REGULATIONS AND REQUIREMENTS PERTAINING TO:

- 11 CFR 104.5(f)
- 2 U.S.C. 434(a)(6)(A)
- 11 CFR 102.17(c)(3)(iii) and (c)(8)(i)(B)

Factual Background

During the 2010 General Election 48-hour notice period (10/14/10 – 10/30/10), the Committee received two transfers-in from two joint fundraising representatives totaling \$48,412.59. On 10/27/10 the Committee filed a 48-hour notice to report the transfer of \$4,468.69 from Moving Mayors Forward (Image #10991797441-2 and attached). On 10/29/10, the Committee filed a 48-hour notice to report the transfer of \$43,943.90 from Rhode Island Victory (Image #10991803142-3 and attached).

On the subsequently filed 2010 30-Day Post General Report (10/14/10 - 11/22/10), the Committee reported these transfers, as well as their corresponding itemized and unitemized memo entries, which totaled \$66,016.66. Specifically, a \$5000 memo itemization was attached to the \$4,468.69 transfer on 10/26/10 from Moving Mayors Forward (C00488833) and \$61,016.66 in memo itemizations were attached to the \$43,943.90 transfer on 10/28/10 from Rhode Island Victory (C00490169).

The Cicilline Committee
PO Box 9187
Providence, RI 02940

Tel. 401-553-2010
www.cicilline.com

12092680514

David Cicilline

FOR U.S. CONGRESS

On 1/5/11, the Committee was sent a Request For Additional Information that cited 11 CFR 104.5(f) and indicated a failure to file 48-hour notices for a total of 19 contributions, amounting to \$45,600. The Committee responded to the letter on 1/15/11 (Image# 11990055970) in a miscellaneous text (F99) referring the analyst to 4 of the 19 48-hour notices the Committee did in fact timely file. The F99 also explained that the remaining 15 were memo items corresponding to joint fundraising transfers that the Committee had also filed 48-hour notices for. However it became clear upon receiving AF#2488 that the explanation was considered inadequate by the analyst (Chris Jones) and presumably the Compliance Branch of the Reports Analysis Division (RAD) at the FEC.

While reporting instructions for when and how 48-hour notices are to be filed for normal contributions to candidates, as well as loans, in-kind contributions, and personal advances, are provided in the Candidate Campaign Guide and Form 6 instructions, there is nothing to address the way in which committees should report 48-hour notices in the case of joint fundraising transfers and/or their attached memo entries.¹ The primary basis of the challenge to AF#2488 is the prevalence of several conflicting regulations and disclosure guidelines, which led to the acquirement of the fine to begin with.

Basis of Challenge

Instructions for when and how 48-hour notices should be filed in the case of typical contributions cite 11 CFR 104.5(f). This is also the regulation cited in the Request For Additional Information sent from Chris Jones to the Committee on 1/5/11. However, the Notice of Administrative Fine (6/24/11) regarding this same issue cites 2 U.S.C. 434(a)(6)(A). Though the two are similar, there are ambiguities and inconsistencies within and among them. For this reason, there are multiple applicable interpretations as to how 48-hour notices should be reported in the case of joint fundraising transfers. Such conflicting interpretations have led to inconsistent reporting practices, as well as inconsistent review by RAD analysts.

11 CFR 104.5(f) states that:

"If any contribution of \$1,000 or more is received by any authorized committee of a candidate after the 20th day, but more than 48 hours, before 12:01 a.m. of the day of the election, the principal campaign committee of that candidate shall notify the Commission, the Secretary of the Senate and the Secretary of State, as appropriate, within 48 hours of receipt of the contribution."

There are two conceivable ways to interpret this regulation. Either (1) the principal campaign committee of the candidate must file a 48-hour notice within 48 hours of the joint fundraising representative (which is an authorized committee of the candidate) having received a contribution of \$1000 or more; OR (2) the principal campaign committee of the candidate shall notify the Commission within 48 hours of receiving the contribution from the joint fundraising representative (if within the specified timeframe).

The latter of the two interpretations of 11 CFR 104.5(f) is the most commonly applied for several practical reasons. Assuming that the participating candidate committee(s) are privy to information held

¹ This includes supplemental reporting materials and guidelines available on the public record, including Advisory Opinions.

The Cicilline Committee
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Providence, RI 02940

Tel. 401-553-2010
www.cicilline.com



12092680515

David Cicilline

FOR U.S. CONGRESS

by the joint fundraising representative regarding receipt dates of bulk contributions (which is not a certainty if the respective treasurers are different), it is not automatically apparent as to how much of each bulk contribution will be attributed and transferred to each participant. It is often unclear which will require itemization and/or a 48-hour notice. Thus it is common practice is for the participating candidate to wait until the transfer is received, and contributor information becomes available, before filing. Moreover, after examining 48-hour notices filed by several prominent candidates, there is no evidence that RAD analysts or the Compliance Branch of RAD enforces this regulation in other way than what is outlined in the second interpretation noted above.²

2 U.S.C. 434(a)(6)(A) states that:

"The principal campaign committee of a candidate shall notify the Secretary or the Commission, and the Secretary of State, as appropriate, in writing, of any contribution of \$1,000 or more received by any authorized committee of such candidate after the 20th day, but more than 48 hours before, any election."

By contrast, this statute has only one interpretation as it pertains to the issue at hand, which is that the principal campaign committee of the candidate must file 48-hour notices within 48 hours of the joint fundraising representative receiving a contribution of \$1000 or more, (again because joint fundraising representatives are authorized committees of the candidate). Though unambiguous in its wording, it conflicts with the common interpretation of 11 CFR 104.5(f) and widespread practice of filing 48-hour notices after receiving a joint fundraiser's transfer-in.

Despite the conflicting technical implications between 11 CFR 104.5(f) and 2 U.S.C. 434(a)(6)(A), the purpose of these regulations is the same. Their intention is to make the Commission - and more importantly, the public - aware of any funds that become available to a candidate during this critically specified time period; funds which can subsequently be used to influence the outcome of an election.

Because joint fundraising receipts include bulk contributions to several campaigns, disclosing the entire joint fundraising receipt in 48-hour notice as required by 2 U.S.C. 434(a)(6)(A) would be misleading to the public because the candidate's available cash balance would appear inflated. Alternatively, filing 48-hour notices to reflect itemized memo entries (assuming this is possible) would also incorrectly reflect the amount of money that became available to the Committee during the specified time period. This is because first) in most cases, including this one, the memos amount to more than the transfer-in after subtracting joint fundraising costs, etc.; and second) there is no regulation stipulating a timeframe for when the actual transfer from the joint fundraising representative to the principal campaign committee must occur. Thus lacking any clear guidelines, and operating in way as to most adequately comply with the intent of the law, the Committee duly disclosed the gross amount of the transfers on 48-hour notices filed on 10/27/2010 and 10/29/10.

Moreover, the issue is further compounded by the way in which memos attached to joint fundraising transfers are required to be reported according to 11 CFR 102.17(c)(3)(iii), which states:

² Specific examples are provided in the Advisory Opinion



12092680516

David Cicilline

FOR U.S. CONGRESS

"For contribution reporting and limitation purposes, the date of receipt of a contribution by a participating political committee is the date that the contribution is received by the fundraising representative."

Complying with both the 48-hour notice requirements of 11 CFR 104.5(f) (or 2 U.S.C. 434(a)(6)(A)) as well as the joint fundraiser reporting specifications noted in 11 CFR 102.17(c)(3)(iii), would necessitate the candidate's committee file a 48-hour notice containing specific donor information before that information becomes available to the candidate. Because of this ambiguity, 11 CFR 102.17(c)(3)(iii) is often neglected entirely by committees, as well as by RAD, which does not appear to cross-reference any reports to check these dates.³ Rather, candidate committees tend to itemize memo entries with the same date that the candidate receives the joint fundraising transfer-in.

At this point, we would like to note that if the Committee had reported the itemized memo entries in this common (albeit incorrect) fashion, then the total number of missing 48-hour notices would be reduced from six to one, and consequently, the fine would be reduced to \$3370. However, in order to fully comply with 11 CFR 102.17(c)(3)(iii), the Committee dated each itemized memo entry as the date the joint fundraising representative reported receiving the contribution.

Because of the noted ambiguities and inconsistent (or more accurately, consistently wrong) reporting practices and enforcement of 48-hour notices as they pertain to joint fundraising memos and transfers, the Committee asks that the Commission reconsider its assessment of AF#2488. To be penalized for properly disclosing activity to the fullest extent possible (which means complying with 102.17(c)(3)(iii)) is not only antithetical to the intent of the law, but would further promote inconsistent and improper reporting practices.

We ask that the Commission review the Advisory Opinion filed by the Committee relating to this matter before making a final determination, particularly because this is the first noted incident of its kind. Lastly, we hope for a reduction of the fine due to the fact that its calculation is predicated on a *failure* to file 48-hour notices *at all*. Although ultimately deemed insufficient, there were in fact 48-hour notices filed on 10/27/10 and 10/29/10 to disclose the financial activity this fine is calculated on.

Sincerely,



Brett Smiley
Deputy Treasurer
The Cicilline Committee

³ Prominent examples provided in the Advisory Opinion

The Cicilline Committee
PO Box 9107
Providence, RI 02940

Tel. 401-553-2010
www.cicilline.com



12092680517

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 6 / 6

(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 11d
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14 <input type="checkbox"/> 15

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Moving Mayors Forward

A.

Full Name (Last, First, Middle Initial)

GREAT LAND PAC

Mailing Address 607 14th Street, NW
Suite 800

City State Zip Code

Washington DC 20005

FEC ID number of contributing
federal political committee.

C C00457747

Name of Employer

Occupation

Receipt For: 2010

☐ Primary ☒ General
☐ Other (specify) ▼

Election Cycle-to-Date ▼

10000.00

Date of Receipt

MM / DD / YYYY
09 / 24 / 2010

Transaction ID: SA11C.4099

Amount of Each Receipt this Period

10000.00

SUBTOTAL of Receipts This Page (optional)

10000.00

TOTAL This Period (last page this line number only)

10000.00

12092680518

1 / 2

**48 HOURS NOTICE OF
CONTRIBUTIONS/LOANS RECEIVED**
(See Reverse Side for Instructions)

To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL

Cicilline Committee

ADDRESS (number and street)

102 Waterman St, Suite 2

CITY, STATE, and ZIP CODE

Providence

RI

02906

2. NAME OF CANDIDATE

David N Cicilline

3. OFFICE SOUGHT (State and District)

House

RI

01

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.

4. FEC IDENTIFICATION NUMBER
C00476564

SIGNATURE(Optional)

Nancy Benoit

DATE

10/27/2010

For further information contact:

Federal Election Commission
999 E Street, NW, Washington, DC 20463
Toll Free 800-424-9530, Local 202-694-1100

FEC FORM 6

(Revised 1/2001)

12092680519

FEC FORM 6 - 48 HOUR NOTICE OF CONTRIBUTIONS / LOANS
 (continuation page)

Any information reported herein may not be copied for sale or use by any person for the purposes of soliciting contributions or for any other commercial purposes except that the name and address of any political committee may be used to solicit contributions from that committee.

Name of Individual, Organization, or Corporation

Cicilline Committee

Full Name, Address, and ZIP Code Howard Menaker 1401 Church Street, NW #503 Washington DC 20005	Name of Employer Self	Date (month, day, year) 10/26/2010	Amount Received this Period 1000.00
	Occupation Consultant		
Full Name, Address, and ZIP Code Charles Nolan 146 Central Park West New York NY 10023	Name of Employer Self	Date (month, day, year) 10/26/2010	Amount Received this Period 1000.00
	Occupation Designer		
Full Name, Address, and ZIP Code MOVING MAYORS FORWARD 102 WATERMAN ST SUITE 2 PROVIDENCE RI 02906	Name of Employer	Date (month, day, year) 10/26/2010	Amount Received this Period 4468.69
	Occupation		

TOTAL THIS PERIOD (last page only)

6468.69

1 / 2

**48 HOURS NOTICE OF
CONTRIBUTIONS/LOANS RECEIVED**
(See Reverse Side for Instructions)

To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL

Cicilline Committee

ADDRESS (number and street)

102 Waterman St, Suite 2

CITY, STATE, and ZIP CODE

Providence

RI

02906

2. NAME OF CANDIDATE

David N Cicilline

3. OFFICE SOUGHT (State and District)

House

RI

01

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.

4. FEC IDENTIFICATION NUMBER
C00476564

SIGNATURE(Optional)

Nancy Benoit

DATE

10/29/2010

For further information contact:

Federal Election Commission
999 E Street, NW, Washington, DC 20463
Toll Free 800-424-9530, Local 202-694-1100

FEC FORM 6

(Revised 1/2001)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Via First Class Mail

August 4, 2011

Nancy L. Benoit, in official capacity as Treasurer
Cicilline Committee
118 N Main Street
Suite 2
Providence, RI 02903

C00476564
AF# 2488

Dear Ms. Benoit:

On August 3, 2011, the Commission's Office of Administrative Review ("OAR") received your written response ("challenge") which is being reviewed by OAR. If you have any questions regarding your challenge, please contact this Office on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

A handwritten signature in black ink, appearing to read "Dayna C. Brown".

Dayna C. Brown
Reviewing Officer
Office of Administrative Review

12092680522

Date: August 19, 2011

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW
CHALLENGE RECEIVED**

AF#: 2488

Committee Name: Cicilline Committee

Committee ID#: C00476564

Committee Address (if different than in RTB letter): N/A

Treasurer Name (if different than in RTB finding): N/A

Attachments:

**Copy of RTB Circulation Report, dated June 2, 2011 and RTB Certification,
dated June 7, 2011 (Y/N): Y**

Attachment #: 1

Proof of Delivery (to be forwarded at later date if not yet received) (Y/N): Y

Attachment #: 2

Other Relevant Telecoms (Y/N): N

Attachment #: N/A

Original Correspondence Received by RAD in Response to RTB Letter (Y/N): N

Attachment #: N/A

RAD Staff Declaration (Y/N): Y

**-2010 Pre- and Post-General Election Report Notice, dated September 27,
2010**

-RFAI Letter, dated January 5, 2011.

-RTB Letter, dated June 24, 2011.

Attachment #: 4

Other RAD Information: (Y/N): N

Attachment#: N/A

12092680523

**Proof of Delivery**[Close Window](#)

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number:

1ZWF58600195111573

Service:

UPS Next Day Air®

Weight:

1.00 lb

Shipped/Billed On:

06/27/2011

Delivered On:

06/28/2011 10:06 A.M.

Delivered To:

PROVIDENCE, RI, US

Signed By:

BEOIT

Left At:

Reception

Thank you for giving us this opportunity to serve you.

Sincerely,

UPS

Tracking results provided by UPS: 06/30/2011 8:52 A.M. ET

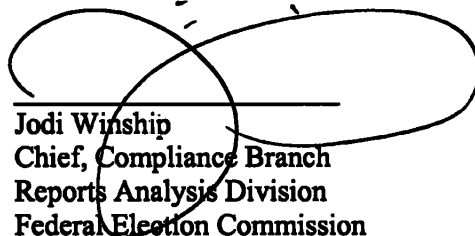
[Print This Page](#)[Close Window](#)

Attachment 2

12092680524

DECLARATION OF JODI WINSHIP

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Cicilline Committee:
 - A) Prior Notice, dated September 27, 2010, referencing the reporting requirements of 48-Hour Notices (sent via electronic mail to: INFO@CICILLINE.COM);
 - B) Request for Additional Information Letter, dated January 5, 2011, referencing the missing 48-Hour Notices;
 - C) Reason-to-Believe Letter, dated June 24, 2011, referencing the missing 2010 48-Hour Notices.
3. I hereby certify that I have searched the Commission's public records and find that Cicilline Committee did not file the 2010 General Election 48-Hour Notices with the Commission within 48 hours after the receipt of the contributions.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 19th day of August, 2011.



Jodi Winship
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission

12092680525



GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL COMMITTEES

September 27, 2010

CURRENT REPORT DUE FOR 2010 GENERAL ELECTION CANDIDATE COMMITTEES

REPORT	REPORTING PERIOD ¹	OVERSIGHT MAILING DEADLINE	FILING DEADLINE
Pre-General	10/01/10 - 10/13/10	10/18/10	10/21/10
48-Hour Notices	10/14/10 - 10/30/10	-- general candidates only -- see filing info --	
Post-General	10/14/10 - 11/22/10	12/02/10	12/02/10

REPORTING SCHEDULE FOR REMAINDER OF 2010

2010 GENERAL ELECTION CANDIDATES

REPORT	REPORTING PERIOD ¹	OVERSIGHT MAILING DEADLINE	FILING DEADLINE
Year-End	11/23/10 - 12/31/10	01/31/11	01/31/11

UNSUCCESSFUL 2010 PRIMARY ELECTION CAMPAIGN COMMITTEES AND CANDIDATES NOT ACTIVE IN 2010 ELECTIONS

REPORT	REPORTING PERIOD ¹	OVERSIGHT MAILING DEADLINE	FILING DEADLINE
Year-End	10/01/10 - 12/31/10	01/31/11	01/31/11

Supplemental Filing Information is available for Congressional Committees.

¹A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered up through the close of books for the first report due.

2010 SUPPLEMENTAL FILING INFORMATION CONGRESSIONAL COMMITTEES

PLEASE NOTE: The Commission provides reminders of upcoming filing dates as a courtesy to help committees comply with the filing deadlines set forth in the Act and Commission regulations. Committee treasurers must comply with all applicable filing deadlines established by law, and the lack of prior notice does not constitute an excuse for failing to comply with any filing deadline.

WHO MUST FILE

Principal campaign committees of all 2010 general election congressional candidates ¹ (including unopposed candidates and candidates whose names do not appear on the ballot) must file Pre- and Post-General Election Reports. ²

Campaigns that raise or spend more than \$5,000 for the 2010 election cycle (and thus trigger registration and reporting requirements) must file quarterly reports throughout 2010, even if the candidate plans to retire, withdraws from the race prior to the primary election, loses the primary or drops out of the race prior to the general election. See 11 CFR 104.5(a)(2).

Before a committee can stop filing with the FEC, it must file a termination report with the Commission. See 11 CFR 102.3. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

METHODS OF FILING REPORTS

Electronic Filing

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the filing deadline. See 11 CFR 104.5(e).

- Web Page: Electronic Filing Page
- Campaign Guide for Congressional Candidates and Committees (Candidate Guide), pp. 82-84 [PDF]

Paper Filing - Meeting the Filing Deadline

Paper Report filing options -- Registered, Certified or Overnight or First Class Mail.

See 11 CFR 104.5(e).

- Web Page: Link to Paper Forms (for downloading and printing)
- Candidate Guide, p. 81 [PDF]

¹ Generally, an individual becomes a candidate for federal office (and thus triggers registration and reporting obligations) when his or her campaign exceeds \$5,000 in either contributions or expenditures. If the campaign has not crossed the \$5,000 threshold, it is not required to file reports. See 11 CFR 100.3(a).

² If a candidate has more than one authorized committee, the principal campaign committee must also file a consolidated report on Form 32 [PDF].

PRE- AND POST-ELECTION REPORTS

A committee whose candidate participates in a 2010 state primary, nominating convention or runoff election -- even if unopposed -- must also file a pre-election report 12 days prior to the primary, nominating convention or runoff. The campaign committee of a candidate who participates in the general election must file pre- and post-general election reports.

See 11 CFR 104.5(a)(2).

- Web Page: 2010 Congressional Pre-Primary Reporting Dates
- The Record: January 2010 issue [PDF]
- Candidate Guide, pp. 79-80 [PDF]

48 HOUR NOTICES ON CONTRIBUTIONS

Notices are required if the committee receives any contribution (including in-kind gifts or advances of goods or services; loans from the candidate or other non-bank sources; and guarantees or endorsements of bank loans to the candidate or committee) of \$1,000 or more per source, during the period of October 14 through October 30, 2010.

The notices must reach the appropriate federal filing office within 48 hours of the committee's receipt of the contribution(s). Campaign committees that file electronically **MUST** submit their 48-hour notices electronically. See 11 CFR 104.5(f).

- Web Page: Electronic Filing Page
- Web Page: Link to Paper Forms (for downloading and printing)
- Form 6 Fax numbers
 - Senate campaigns (Secretary of the Senate): (202) 224-1851
 - House Campaigns (FEC): (202) 219-0174
- Campaign Guide: Candidate Guide, p. 80 [PDF]

COMPLIANCE

Treasurer Responsibility

Committee Treasurers are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.

See 11 CFR 104.14(d).

- Statement of Policy Regarding Treasurers Subject to Enforcement Proceedings [PDF]
- Candidate Guide, p. 7 [PDF]

Administrative Fine Program

Political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$17,600 (or more for repeat late- and non-filers).³

See 11 CFR 111.30.

- Web Page: Administrative Fine Program
- Candidate Guide, pp. 81-82 [PDF]

³ Penalties for late- or non-filing of 48-hour notices are based on the amount of contributions not timely disclosed. As a result, these penalties may exceed \$17,600, even for first-time violations.

DISCLOSURE OF LOBBYIST BUNDLING ACTIVITY

Campaign committees must file FEC Form 3L [PDF] if they receive two or more bundled contributions from lobbyists/registrants or lobbyist/registrant PACs that aggregate in excess of \$16,000 during the applicable reporting period (see page 1 of this notice). See 11 CFR 104.22 and 110.17(e).

- The Record: March 2009 issue [PDF]

2010 REPORTING SCHEDULE

- Web Page: 2010 Reporting Dates Page
- The Record: January 2010 issue [PDF]
- Candidate Guide, p. 79 [PDF]

IMPORTANT FILING INFORMATION - PAPER FILERS

In response to the 2001 anthrax threat, the U.S. Postal Service is irradiating mail directed to many federal agencies, including the FEC and the Secretary of the Senate.⁴ This process has not only delayed mail delivery, it has also damaged and in some cases destroyed pieces of mail. As a result, committees that file reports with the FEC may want to consider submitting their reports by some means other than U.S. mail. Alternative methods include electronic filing, overnight mail or delivery service, and hand delivery.

⁴ Senate committees should contact the Secretary of the Senate at (202) 224-0322 for more information on filing reports via US mail.

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

January 5, 2011

NANCY L. BENOIT, TREASURER
CICILLINE COMMITTEE
102 WATERMAN ST, SUITE 2
PROVIDENCE, RI 02906

Response Due Date
02/09/2011

IDENTIFICATION NUMBER: C00476564

REFERENCE: 30 DAY POST-GENERAL REPORT (10/14/2010 - 11/22/2010)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

1. Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-General Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information. (11 CFR § 104.5(f))

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports)

Attachment 4

12092680530

CICILLINE COMMITTEE

Page 2 of 2

in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended.

If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1132.

Sincerely,



Chris Jones
Senior Campaign Finance Analyst
Reports Analysis Division

496

12092680531

Missing 48-hour notices
The Cicilline Committee (C00476564)
30 Day Post-General Report (10/14/10 - 11/22/10)
General Election 2010
48 Hour Notice Period (10/14/10 - 10/30/10)

CONTRIBUTOR NAME	DATE	AMOUNT	ELECTION
Jaffe, Jill Klinow	10/14/2010	\$1,000.00	G2010
Jaffe, Robert L.	10/14/2010	\$1,000.00	G2010
Citizens Bank PAC	10/14/2010	\$1,000.00	G2010
UNITED FOOD & COMMERCIAL WORKERS INTERNATIONAL UNI	10/14/2010	\$5,000.00	G2010
Lee, Brooke	10/18/2010	\$1,900.00	G2010
Lee, Eugene	10/18/2010	\$1,900.00	G2010
Nelson, Carl	10/18/2010	\$2,400.00	G2010
Nelson, Christine	10/18/2010	\$2,400.00	G2010
Murray, Suzanne Y.	10/19/2010	\$2,400.00	G2010
Varelka, Alison	10/20/2010	\$2,400.00	G2010
Varelka, William M.	10/20/2010	\$2,400.00	G2010
Townsend, Alison K	10/21/2010	\$2,400.00	G2010
Townsend, Charles C III	10/21/2010	\$2,400.00	G2010
Mckinney, Joshua	10/22/2010	\$2,400.00	G2010
Case, Lucia Gill	10/23/2010	\$2,400.00	G2010
Magaziner, Ira	10/23/2010	\$2,400.00	G2010
Magaziner, Suzanne	10/23/2010	\$2,400.00	G2010
Fish, Lawrence K.	10/24/2010	\$2,400.00	G2010
GREAT LAND PAC	10/24/2010	\$5,000.00	G2010



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

100-43827-522

March 27, 2012

SENSITIVE

MEMORANDUM

To: The Commission

Through: *for* Alec Palmer *Am*
Staff Director

From: Patricia Carmona *PC*
Chief Compliance Officer

Dayna C. Brown *DB*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 2488 – Cicilline Committee and Nancy L. Benoit, in her official capacity as Treasurer (C00476564)

On June 23, 2011, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that the Cicilline Committee and Nancy L. Benoit, in her official capacity as Treasurer (“respondents”), violated 2 U.S.C. § 434(a) for failing to file 48-Hour Notices for 15 contributions totaling \$37,600 for the 2010 General Election. The Commission also made a preliminary determination that the civil money penalty was \$4,530 based on the schedule of penalties at 11 C.F.R. § 111.44.

The Commission received the respondents’ written response (“challenge”) on August 3, 2011. Their challenge included an Advisory Opinion request on which they worked with the Commission’s Office of General Counsel.

On January 23, 2012, the Committee’s Compliance Director, Patrick Smock, II Esq. called the Reviewing Officer stating that they would like to withdraw their challenge and pay the fine following the exhaustion of their Advisory Opinion efforts.

On March 1, the Commission received a letter from Mr. Smock indicating their desire to withdraw their challenge to the administrative fine, along with their \$4,350 payment, which were submitted to the Commission’s Government Lockbox.

In response to the Commission’s RTB finding and proposed civil money penalty, respondents have two choices: they must either pay the proposed civil money penalty or submit a

12092680533

challenge. 11 C.F.R. § 111.33. If they decide to pay the RTB civil money penalty and not submit a challenge, the Commission will make a final determination that they violated the statute and send them a final determination notification. 11 C.F.R. § 111.34. If they decide to challenge the RTB finding or proposed civil money penalty, the Reviewing Officer will review the RTB finding with its supporting documentation and the respondents' challenge with its supporting documentation, and then make a written recommendation to the Commission. 11 C.F.R. §§ 111.35 and 111.36.

The respondents chose to submit a challenge. However, because the respondents asked to withdraw their challenge to the RTB finding, the Reviewing Officer will not review their challenge and make a written recommendation to the Commission based on that review. Instead, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$4,530 for failing to file 48-Hour Notices for 15 contributions totaling \$37,600.

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 2488 involving the Cicilline Committee and Nancy L. Benoit, in her official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 2488 that the Cicilline Committee and Nancy L. Benoit, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$4,530; and
- (3) Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Final Determination Recommendation –) AF 2488
Cicilline Committee and Nancy L.)
Benoit, in her official capacity as)
Treasurer (C00476564))

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on April 05, 2012, the Commission decided by a vote of 6-0 to take the following actions in AF 2488:

1. Adopt the Reviewing Officer recommendation for AF# 2488 involving the Cicilline Committee and Nancy L. Benoit, in her official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 2488 that the Cicilline Committee and Nancy L. Benoit, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$4,530.
3. Send the appropriate letter.

Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

April 5, 2012
Date

Shawn Woodhead Werth
Shawn Woodhead Werth
Secretary and Clerk of the Commission

12092680535



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 10, 2012

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Nancy L. Benoit, in official capacity as Treasurer
Cicilline Committee
118 N Main Street, Suite 2
Providence, RI 02903

C00476564
AF# 2488

Dear Ms. Benoit:

On June 23, 2011, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that the Cicilline Committee and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) for failing to file 48-Hour Notices for 15 contributions totaling \$37,600 for the 2010 General Election. By letter dated June 24, 2011, the Commission sent you notification of the RTB finding that included a civil money penalty calculated at RTB of \$4,530 in accordance with the schedule of penalties at 11 C.F.R. § 111.44.

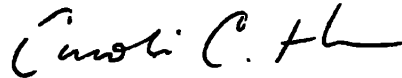
The Commission received the written response ("challenge") on August 3, 2011. On March 1, 2012, the Commission received a letter from the Committee's Compliance Director, Patrick Smock, II Esq., indicating the withdrawal of the challenge to the administrative fine. Included with the letter was payment of the \$4,530 civil money penalty. Therefore, the Commission made a final determination on April 5, 2012, that the Cicilline Committee and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a), and assessed a civil money penalty in the amount of \$4,350, in accordance with 11 C.F.R. § 111.44.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within 30 days from the date of the Commission's notification, this could occur at any time following certification of the Commission's vote.

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If you have any questions regarding this matter, please contact Dayna Brown on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

On behalf of the Commission,

A handwritten signature in cursive script, appearing to read "Caroline C. Hunter".

Caroline C. Hunter
Chair

12092680537

QUALITY IS OUR PRIORITY FOR LOCKBOX 9058
SEQ# 001 \$ 0000453000 BA# 1 01-27-12 20 3



THE CICILLINE COMMITTEE P.O. BOX 9107 PROVIDENCE, RI 02940		CITIZENS BANK PROVIDENCE, RI	1730 1/20/2012
PAY TO THE ORDER OF <u>Federal Election Commission</u>		\$ 4,530.00	
<u>Four Thousand Five Hundred Thirty and 00/100</u>		DOLLARS	
Federal Election Commission P.O. Box 989058 St. Louis, MO 63197-9000		MEMO	

12092680538



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2488

DATE SCANNED

5/4/12

SCANNER NO.

2

SCAN OPERATOR

EE5

12092680539